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7 Attorney for Defendant
8 JOHN DOE 1

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA

| | | |
|----------------------|---|-------------------------------------|
| 11 JANE ROE, |) | Case No.: 4:23-cv-01099 |
| 12 Plaintiff, |) | |
| 13 vs. |) | STIPULATION AND PROPOSED |
| 14 JOHN DOE, et al., |) | ORDER TO CONTINUE CASE |
| 15 Defendants. |) | MANAGEMENT CONFERENCE |
| |) | (AS MODIFIED) |

16
17 Plaintiff Jane Roe and Defendant John Doe 1, by and through their attorneys of
18 record, hereby jointly request that the Court continue the currently scheduled Case
19 Management Conference set for June 21, 2023 at 1:30 p.m., to either:

20 August 2, 2023 at 1:30 p.m;

21 August 16, 2023 at 1:30 p.m.; or

22 August 30, 2023 at 1:30 pm.

23 Good cause exists for this requested continuance:

- 24 1. Counsel for plaintiff is currently in trial and is expected to still be in trial on
25 June 21, 2023.
26 2. The parties have been working together cooperatively and have agreed to this
27 matter be submitted to the Court's ADR Program.

3. The Hon. Ellen S. James (Ret.) was appointed as the Court ordered mediator in this case on June 13, 2023, under ADR L.R. 6, (Doc. 15);
4. The parties agree that a Case Management Conference would be more productive after the parties have engaged, at least, in the required pre-mediation conference with Judge James.
5. The parties will endeavor to have the mediation in this case completed before the end of July 2023, Judge James' calendar permitting.

Therefore, the parties respectfully request that the Case Management Conference be continued to either August 2nd, 16th, or 30th, at 1:30 p.m., and to submit a revised joint report to the Court as required by the Court's order.

Dated: June 14, 2023,

LAW OFFICES OF WALTER C. COOK

By: 

Walter C. Cook, Attorney for
Defendant John Doe 1

Dated: June 14, 2023,

MAAS & RUSSO, LLP

By: 

Daniel J. Russo, Attorney for
Plaintiff Jane Roe

ORDER

Pursuant to stipulation, and for good cause shown, it is hereby ordered that the **initial** case management conference is continued to (pick one)

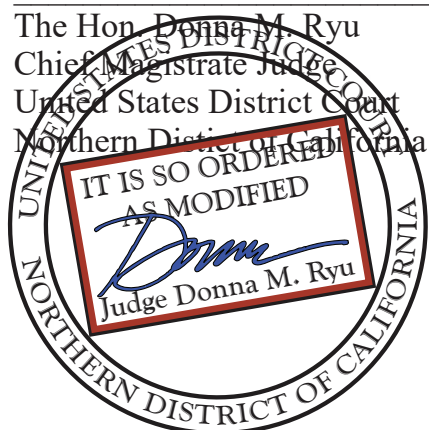
~~August 2, 2023,~~

~~August 16, 2023,~~

August 30, 2023, **in Oakland, by Videoconference only**

case mgmt. conf. statement **seven**
commencing at 1:30 p.m. A revised joint status report shall be filed ~~fourteen~~ days before the conference. All counsel and parties may access the webinar information (public hearings) at <https://cand.uscourts.gov/judges/ryu-donna-m-dmr/>.

Dated: June 16, 2023



PROOF OF SERVICE

I declare that I am a United States citizen, over eighteen and not a party to this action. My business address is 2995 Woodside Rd, #400, Woodside, CA, 94062 On the below date I served:

STIPULATION AND [PROPOSED] ORDER TO CONTINUE CASE MANAGEMENT CONFERENCE

☒ **MAIL**¹ ☐ **CERTIFIED MAIL**² ☐ **NEXT-DAY SERVICE**³
☐ **HAND DELIVERY**⁴ ☐ **FACSIMILE**⁵ ☒ **EMAIL**⁶

on the interested party or parties as indicated below, addressed as follows:

| | |
|--|--|
| Daniel J. Russo MAAS & RUSSO 521 Georgia Street Vallejo, CA 94590 Phone:(707)644-4004 Facsimile:(70) 644-7528 | Attorney For Plaintiff, Jane Doe, law@maasrusso.com |
|--|--|

Dated: June ____, 2023

Walter Cook

¹ I personally sealed the document(s) in a postage paid package, addressed as indicated above. Following ordinary office practice, I placed it in the office's usual location for mailing with the USPS.

² I personally served the document(s) as mail described above, and certified it with return receipt requested.

³ I personally sealed the document(s) in a postage paid package, addressed as indicated above. Following ordinary office practice, I placed it in a regularly used drop box by an overnight delivery service.

⁴ I personally sealed the document(s) in a package, addressed as indicated above. I caused such envelope to be hand-delivered by a same-day messenger service to the addressee(s) on this date.

⁵ I personally faxed the document(s) addressed as indicated above. No error was reported by the sending machine. The transmission record for this facsimile complies with California Rule of Court 2003(6).

⁶ I personally electronically served the document(s) to the electronic mailing address indicated above.